

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

W.R. Grace & Co., *et al.*,

Debtors.

Chapter 11

Case No. 01-01139 (JKF)
(Jointly Administered)

**DEBTORS' NOTICE OF DEPOSITION TO SEATON INSURANCE COMPANY,
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 30(B)(6)**

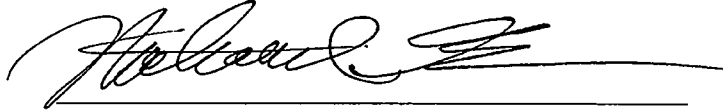
PLEASE TAKE NOTICE that W.R. Grace & Co., et al. ("Grace"), through their undersigned counsel, will take the deposition(s) upon oral examination of Seaton Insurance Company ("Seaton") pursuant to Bankruptcy Rules 7030 and 9014 and Federal Rule of Civil Procedure 30(b)(6), before a notary public or an officer authorized by law to administer oaths. The deposition will take place on January 20, 2010 at 9:00 AM eastern time at the law offices of Pachulski, Stang, Ziehl, & Jones, 919 North Market Street, 17th floor, Wilmington, DE 19899, or on such other date and at such other location as mutually agreed by Seaton and Grace, and shall continue from day to day until concluded.

Pursuant to Rule 30(b)(6), Seaton shall designate one or more officers, directors, managing agents or other persons who consent to testify on its behalf as to all facts and other information known or reasonably available to Seaton relating to the following topics:

1. The first notice given to Unigard Security Insurance Company ("Unigard"), predecessor to Seaton, of any claim, litigation, or demand for payment relating to an oil pipeline at Otis Air Force base in Sandwich, Massachusetts, made by Kaneb against Grace or Unigard, or made by Grace against Unigard.
2. The first notice given to Unigard, predecessor to Seaton, of any claim, litigation, or demand for payment relating to an oil pipeline in Macon, Georgia serving Warner Robins Air Force base, made by Kaneb against Grace or Unigard, or made by Grace against Unigard.

Dated: January 8, 2010

KIRKLAND & ELLIS LLP

A handwritten signature in black ink, appearing to read "David M. Bernick", is written over a horizontal line.

David M. Bernick, P.C.
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And

PACHULSKI, STANG, ZIEHL, YOUNG & JONES
P.C.

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Co-Counsel for the Debtors and Debtors in
Possession